

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC., *et al.*,

Debtors.

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)  
) Chapter 11  
)

) Case No. 25-10068 (CTG)  
)

) Jointly Administered  
)

) **Re: D.I. No. 222**  
)  
)  
)

**CERTIFICATION OF COUNSEL OF REVISED PROPOSED ORDER  
REGARDING MOTION OF RUTH KUMP FOR RELIEF FROM THE AUTOMATIC  
STAY PURSUANT TO SECTION 362(D) OF THE BANKRUPTCY CODE**

I, Michael J. Joyce, counsel for Ruth Kump (“Movant”) hereby certify as follows:

1. On January 30, 2025, Movant filed the *Motion of Ruth Kump for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code* [D.I. No. 222] (the “Motion”).

2. Counsel for Movant and counsel for the Debtors have reached agreement on a revised proposed from of order (the “Proposed Order”) resolving the Motion. A true and correct copy of the Proposed Order is attached hereto as Exhibit “A”.

*[Signature Page to Follow]*

**WHEREFORE**, it is hereby respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: March 25, 2025

**JOYCE, LLC**

/s/ Michael J. Joyce

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*Counsel to Ruth Kump*